

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLENDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER, and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF TECHNOLOGY, UNIVERSITY OF CHICAGO, THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES OF DARTMOUTH COLLEGE, DUKE UNIVERSITY, EMORY UNIVERSITY, GEORGETOWN UNIVERSITY, THE JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS INSTITUTE OF TECHNOLOGY, NORTHWESTERN UNIVERSITY, UNIVERSITY OF NOTRE DAME DU LAC, THE TRUSTEES OF THE UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH RICE UNIVERSITY, VANDERBILT UNIVERSITY, and YALE UNIVERSITY,

Defendants.

**Case No. 1:22-cv-00125**

**Hon. Matthew F. Kennelly**

**PLAINTIFFS' MOTION TO COMPEL AND FOR SANCTIONS AGAINST  
GEORGETOWN UNIVERSITY AND ITS COUNSEL AND FOR RELATED RELIEF**

Plaintiffs respectfully move to compel and for sanctions against Defendant Georgetown University (“Georgetown”) and its counsel and for related relief, on the grounds set forth in the supporting memorandum submitted on this same date and exhibits submitted therewith, and as reflected in the Proposed Order that Plaintiffs are submitting herewith.

Dated: July 17, 2023

Respectfully Submitted,

By:/s/Robert D. Gilbert

Robert D. Gilbert  
Elpidio Villarreal  
Robert S. Raymar  
Sarah Schuster  
Steven Magnusson  
GILBERT LITIGATORS &  
COUNSELORS, P.C.  
11 Broadway, Suite 615  
New York, NY 10004  
Phone: (646) 448-5269  
rgilbert@gilbertlitigators.com  
pdvillarreal@gilbertlitigators.com  
rraymar@gilbertlitigators.com  
sschuster@gilbertlitigators.com  
amarquez@gilbertlitigators.com  
smagnusson@gilbertlitigators.com

/s/ Edward J. Normand

Devin “Vel” Freedman  
Edward J. Normand  
Peter Bach-y-Rita  
FREEDMAN NORMAND  
FRIEDLAND LLP  
99 Park Avenue  
Suite 1910  
New York, NY 10016  
Tel: 646-970-7513  
vel@fnf.law  
tnormand@fnf.law  
pbachyrita@fnf.law

Eric L. Cramer  
Caitlin G. Coslett  
Ellen Noteware  
BERGER MONTAGUE PC  
1818 Market Street, Suite 3600  
Philadelphia, PA 19103  
Tel: 215-875-3000  
ecramer@bm.net  
ccoslett@bm.net  
enoteware@bm.net  
Richard Schwartz  
BERGER MONTAGUE PC  
1720 W Division  
Chicago, IL 60622  
Tel: 773-257-0255  
rschwartz@bm.net

Daniel J. Walker  
Robert E. Litan  
Hope Brinn  
BERGER MONTAGUE PC  
2001 Pennsylvania Avenue, NW  
Suite 300  
Washington, DC 20006  
Tel: 202-559-9745  
rlitan@bm.net  
dwalker@bm.net  
hbrinn@bm.net